

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 CHINEDU IHEJIERE, )  
 Defendant )

2019 APR 25 P 2:45

Criminal Case No. 19-CR-77-01-LM

INFORMATION

The United States Attorney Charges:

COUNT ONE

[18 U.S.C. §§ 1349 and 1344 – Conspiracy to Commit Bank Fraud]

*Background*

At all times relevant to this Information:

1. Eastern Bank was a financial institution as that term is defined in 18 U.S.C. § 20 as its deposits were insured by the Federal Deposit Insurance Corporation (“FDIC”).
2. Fifth Third Bank was a financial institution as that term is defined in 18 U.S.C. § 20 as its deposits were insured by the FDIC.

*The Conspiracy*

3. From on or about June 1, 2017, to on or about October 10, 2017, in the District of New Hampshire and elsewhere, the defendant,

CHINEDU IHEJIERE,

knowingly and willfully conspired and agreed with L.A. and other known and unknown persons to devise and execute and attempt to execute a scheme and artifice to defraud Eastern Bank and Fifth Third Bank (the “financial institutions”) and to obtain money in the custody and control of

the financial institutions by means of false and fraudulent pretenses, representations and promises, in violation of Title 18 United States Code Sections 1349 and 1344.

*Manner and Means of the Conspiracy*

4. It was a part of the conspiracy that IHEJIERE and his co-conspirators knowingly opened bank accounts at the Financial Institutions using other person's identification information. Thereafter, IHEJIERE caused fraudulently obtained checks and money orders to be deposited to the bank accounts at the financial institutions. After the deposits were posted to the affected accounts, IHEJIERE and his co-conspirators acquired proceeds from each such stolen check and money order by causing funds to be withdrawn from the accounts through debit card purchases, ATM withdrawals, Postal Money Orders, and Cashier's Checks.

*Overt Acts*

5. In furtherance of the conspiracy and to effect its object, IHEJIERE and his co-conspirators committed and caused the following overt acts to be committed in the District of New Hampshire and elsewhere.

- a. On or about the dates charted below, known and unknown co-conspirators of the defendant opened bank accounts at the charted locations using another person's identification information.

<b>Overt Act</b>	<b>Date</b>	<b>Bank</b>	<b>Location</b>
1	6/1/2016	Eastern Bank	Boston, MA
3	11/2/2016	Eastern Bank	Nashua, NH
4	2/3/2017	Eastern Bank	Wilmington, MA
5	5/13/2017	Eastern Bank	Boston, MA

- b. On or about the date charted below, the defendant opened bank accounts at the charted location using another person's identification information.

Overt Act	Date	Bank	Location
6	8/4/2017	Fifth Third Bank	Norcross, GA

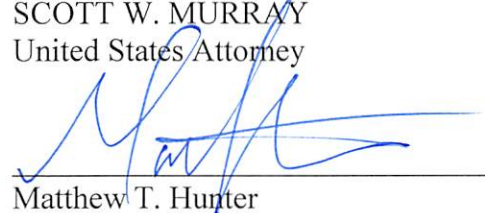
c. On or about the dates charted below, the defendant caused the following stolen checks to be deposited into Eastern Bank and Fifth Third Bank accounts opened as part of the scheme.

Overt Act	Date	Amount	Bank	Payee
7	8/2/2016	\$12,021.16	Eastern Bank	Control Risks Group LLC
8	8/17/2016	\$19,945.09	Eastern Bank	Soonoco
9	8/5/2017	\$65,756.02	Fifth Third Bank	Prudential
10	8/22/2017	\$22,126.45	Eastern Bank	Associated Wholesale Grocers, Inc.

All in violation of Title 18, United States Code, Sections 1349 and 1344.

DATED: April 25, 2019

SCOTT W. MURRAY  
United States Attorney

  
 Matthew T. Hunter  
Special Assistant United States Attorney